

LAW OFFICES OF JILL R. SHELL

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Telephone: 212.792.4911 / Fax: 212.792.4946 / [jrs@shellowlaw.com](mailto:jrs@shellowlaw.com)  
15 Chester Avenue / White Plains New York 10601

June 13, 2022

**BY EMAIL AND ECF**

Honorable Analisa Torres  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007  
[Torres\\_NYSDChambers@nysd.uscourts.gov](mailto:Torres_NYSDChambers@nysd.uscourts.gov)

**RE: *United States v. Cholo Abdi Abdullah*, 20-cr-677 (AT)**

Dear Judge Torres:

Andrew Patel and I represent Cholo Abdullah, and we write in response to Your Honor's February 14, 2022 order scheduling the deadline for defense motions and requesting blackout dates for the first two quarters of 2023.

When Mr. Patel and I spoke last evening about how we intended to respond to Your Honor's request for blackout dates, I reviewed Your Honor's Order. Much to my chagrin I discovered that defense motions are due tomorrow. Due to case-related and personal circumstances totally beyond our control we are not in a position to file defense motions at this time, and we do not anticipate being ready for trial to proceed in the first six months of next year.

Accordingly, we respectfully request that the defense motions deadline be extended and that we be permitted to make a scheduling request to Your Honor addressed to a motions schedule no later than July 5, 2022. Our concerns about proposing a trial date are based on our inability even minimally to investigate this case because of the continuing global pandemic.

I have conferred with the Government and was told that the Government takes no position on this request.

Thank you for your consideration.

**GRANTED. By July 5, 2022, Defendant shall submit a proposed motions schedule.**

**SO ORDERED.**

Dated: June 14, 2022

New York, New York

  
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ANALISA TORRES  
United States District Judge